



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF SITE REMEDIATION

Department of Environmental Management
291 Promenade Street
Providence, R.I. 02908 - 5767

2 September 1993

Todd Bobar, RPM
U.S. Department of the Navy
Northern Division
10 Industrial Highway
Code 1823 - Mail Stop 82
Lester, PA 19113-2090

received
9-3-93

RE: Proposed Plan: McAllister Point Landfill, Naval Education Training Center (NETC),
Newport, RI.

Dear Mr. Bobar:

On 25 August 1993, an informational meeting and public hearing was held on the Proposed Plan for the McAllister Point Landfill at the Newport Education and Training Center, Newport, RI, in which the State communicated its concerns regarding the preferred alternative.

During this event, the State discussed the overwhelming importance of obtaining defensible, qualifying data via the Phase II investigations in order to achieve the many objectives set forth in the Proposed Plan, and ultimately the Record of Decision.

This comment package reiterates the issues discussed in the public meeting, and also summarizes all outstanding concerns associated with the Phase II Investigations, the Focused Feasibility Study and the Proposed Plan. The State considers this attachment to represent that which is necessary, at a minimum, in order to insure proper protection of both human health and the environment at this site.

Please feel free to contact Greg Fine at (401) 277-2797.

Sincerely,



Terrence Gray, P.E., Chief
Division of Site Remediation

cc. W. Angell, DEM/DSR
G. Fine, DEM/DSR
C. Cote, DEM Legal
M. Sanderson, USEPA
K. Anderson, CRMC

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The State supports the concept of installing a multilayered cap at the McAllister Point Landfill for source control. However, due to the nature of the site, and the fact that a Phase II Remedial Investigation has not been conducted at the site, the State feels that the following information must be obtained as it will affect the proposed remedy:

1. The landfill is located adjacent to Narragansett Bay and is subject to tidal influences, flooding and wave actions. The State will recommend that these conditions be taken into account when the Navy conducts their leachate generation study. In addition, tidal influences and wave actions may have a bearing on any areas of highly contaminated material (i.e. , hot spots) located at the site.
2. The State is concerned about the potential for hot spots to be present at the site. The Navy has proposed limiting the number of surface soil samples to be collected during the Phase II Remedial Investigation. The Navy should consider applying the resources which will be realized from the reduction of surface soil samples to an expansion of the number of subsurface soil samples. The purpose of this effort would be to further determine the potential existence of hot spots at the site.

The Navy has identified two potential "hot spots" at the site and has proposed conducting a soil gas survey and also locating certain monitoring wells and subsurface borings in order to investigate these spots. The State has identified two additional hot spots and has recommended that the Navy increase the area to be covered by the soil gas survey to investigate these additional hot spots.

The State has also recommended that the Navy test for Non Aqueous Phase Liquids or NAPLs at the site. Trace amounts of NAPLS were detected during Phase I Investigations. The Navy has proposed a limited test for NAPLs. The State has recommended expanding the test. Since installation of a cap will not result in the remediation of NAPLs, their presence must be determine in advance, so that, if warranted, appropriate remediation methods will be implemented prior to cap construction.

3. The State concurs with the Navy's current sampling event which will aid in characterizing the sediments and biota adjacent to the site. The results of this sampling effort will be evaluated in the assessment of the ecological impacts and determine whether the sediments require remediation. However, the State is concerned that if sediments are found to be contaminated, then the appropriate investigations to determine the extent of contamination will not be completed in time to allow for the placement of these sediments under the cap.

As previously stated, the State supports the proposal to install a multilayer cap at the site

for source control. However, due to the location of the site, the State does have a number of concerns with respect to the actual design of the proposed cap.

1. Currently, it is believed that a portion of the site lies within the flood plain of the bay. In addition, the cap will be exposed to flooding and wave action resulting from hurricanes and other storm events. The Navy has proposed performing a modeling study on the site to optimize cap design for storm events. The State has made a number of additional suggestions on ways to improve the cap design, such as, recommending that the Navy investigate the use of geogrids or geotecs type materials to stabilize the vegetative layer. The State has also proposed that the Navy investigate cap construction efforts for other sites located adjacent to large surface water bodies as well as the practices required at other coastal states. The State believes that this effort will be cost effective and will prove to be beneficial.
2. A second concern is that in order to achieve the desired slopes at the landfill, either the existing slopes will have to be cut back or portions of the shoreline, and potentially the bay, will have to be filled in. The State has recommended that the Navy make every effort to avoid filling in the bay in order to achieve the desired slopes.
3. As indicated by the Navy, landfill gas control will probably be initiated at the site. The State has recommended that the Navy investigate the potential to place the gas extraction wells in areas of known hot spots. These wells would then serve two functions: (1) collect landfill gases, (2) remove contaminants from the site through vapor extraction.
4. The State feels that both the State Solid Waste Regulations and the State Groundwater Regulations apply to the site. The Solid Waste Regulations may be considered to be more stringent than the requirements listed under RCRA Subtitle C under certain interpretations. The Groundwater Regulations have Preventive Action Limits which are stricter than Federal Maximum Contaminant Levels and allow for action to be taken at an earlier stage. The State will recommend that both of these regulations be included in the Proposed Plan for the site.

In conclusion, we believe these issues must be addressed as they will affect remedial alternatives for Operable Unit 1, Source Control, and Operable Unit 2, Management of Migration. Possible remedial alternatives for this site, such as the pumping and treating of groundwater beneath the site, the excavation or remediation of hot spots at the site, and the potential placement of contaminated sediments beneath the cap obviously will effect, as well as be affected by, the design of the cap. Since construction of the cap must by law commence within fifteen months of ROD signature, it is critical that these investigations be conducted in a timely manner so that appropriate remedial measures can be taken. Furthermore, since these investigations are crucial to both Operable Unit 1 and 2 the State will recommend that language will be included in the ROD to address these issues.